

Noggle, William

From: Noggle, William
Sent: Friday, November 01, 2013 4:15 PM
To: Ronald.L.Johnsen@uscg.mil
Cc: Wandelt, Edward; Melchers, John A CIV; McMenamin, Robert; Murad, Dale; Beach, Jeff L CIV; Raybon, Todd E LCDR
Subject: RE: USCGC STORIS HAZMAT SURVEY

Ron,
Thanks for the response. The boilerplate language is not correct if these vessels are to be sold for foreign scrapping. Any PCBs over 50 ppm, including totally enclosed, are in violation of TSCA if exported for disposal.

Is the document true? Were liquid-filled electrical cables on board the vessel when it was auctioned by GSA? Would it help if I setup a conference call with everyone to discuss?

Thanks again,
Bill

(mobile)

-----Original Message-----

From: Ronald.L.Johnsen@uscg.mil [<mailto:Ronald.L.Johnsen@uscg.mil>]
Sent: Friday, November 01, 2013 3:26 PM
To: Noggle, William
Cc: Wandelt, Edward; Melchers, John A CIV; McMenamin, Robert; Murad, Dale; Beach, Jeff L CIV; Raybon, Todd E LCDR
Subject: RE: USCGC STORIS HAZMAT SURVEY

Mr. Noggle,

I'm responding for Jeff Beach since he is out today.

The statement in the January 17, 2007 memorandum "All material that is above 50ppm and not defined as totally enclosed are considered PCB containing for regulatory purposes" is boilerplate language which was used at the time it was written to indicate that all appropriate action WRT the removal of PCB's prior to disposal of a vessel had been taken. More precise language on the subject which addressed the specific findings relating to this particular vessel is contained in para 1 of the 15 Nov 2000 Memorandum attached to the January 17, 2007 memorandum. That paragraph indicates that a survey was conducted, that all accessible compartments were surveyed, and that we concluded that the vessel does not contain PCBs. Please note that while most of the vessel was accessible, and is therefore directly addressed in the statement in the 2007 memorandum, we were and are familiar with the materials that would have been used in the inaccessible portions of the vessel and that we neither had nor have any reason to believe there might be PCBs in those portions of the vessel.

Regards,
Ron

Ronald L. Johnsen, P.G.
Team Lead, Office of Environmental Management, CG-47 US Coast Guard Headquarters Stop 7714
2703 Martin Luther King Jr Ave SE
Washington, DC 20593-7714
Phone: 202-475-5692

-----Original Message-----

From: Noggle.William@epa.gov [<mailto:Noggle.William@epa.gov>]
Sent: Thursday, October 31, 2013 9:29 AM
To: Beach, Jeff L CIV
Cc: Melchers, John A CIV
Subject: RE: USCGC STORIS HAZMAT SURVEY

Jeff,

Thanks for the info, but could you please call me when you have a chance. I need to understand the following statement in that letter: "All material that is above 50ppm and not defined as totally enclosed are considered PCB containing for regulatory purposes"

Thanks,
Bill

(mobile)

-----Original Message-----

From: Jeff.L.Beach@uscg.mil [<mailto:Jeff.L.Beach@uscg.mil>]
Sent: Tuesday, October 29, 2013 1:40 PM
To: Noggle, William
Cc: Melchers, John A CIV
Subject: RE: USCGC STORIS HAZMAT SURVEY

It's my understanding that the areas identified as 140 and 81 ppm on the 15 NOV 2000 report were removed from the vessel. The person who conducted the survey is no longer a Coast Guard employee.

Jeff Beach, CPPM
Manager of Retired CG Boats & Decommissioned Cutters USCG Headquarters @ ST "E" Campus
(202) 372-3646

-----Original Message-----

From: Noggle.William@epa.gov [<mailto:Noggle.William@epa.gov>]
Sent: Tuesday, October 29, 2013 12:09 PM
To: Beach, Jeff L CIV
Cc: Melchers, John A CIV
Subject: RE: USCGC STORIS HAZMAT SURVEY

Jeff,

Thanks for the document. What does this mean: "Please be advised that the CGC Storis is free of PCBs. All material that is above 50ppm and not defined as totally enclosed are considered PCB containing for regulatory purposes." Does this mean that there were totally enclosed PCBs above 50ppm on the vessel that were not removed/remediated?

Thanks,
Bill

(mobile)

-----Original Message-----

From: Jeff.L.Beach@uscg.mil [<mailto:Jeff.L.Beach@uscg.mil>]
Sent: Tuesday, October 29, 2013 11:10 AM
To: Noggle, William
Cc: Melchers, John A CIV
Subject: FW: USCGC STORIS HAZMAT SURVEY

Mr. Noogle

Page 1 of the attachment is a 1/17/2007 report following removal of regulated PCB material from the USCGC STORIS prior to the ships retirement from active service. I am not qualified to say what material remained on board the ship.

Pages 2-5 are copies of the 2000 HAZMAT survey you are already aware of.

Jeff Beach, CPPM

Manager of Retired CG Boats & Decommissioned Cutters USCG Headquarters @ ST "E" Campus
(202) 372-3646

-----Original Message-----

From: Beach, Jeff L CIV

Sent: Thursday, October 24, 2013 11:10 AM

To: 'rollins.christopher@epa.gov'

Subject: FW: USCGC STORIS HAZMAT SURVEY

STORIS documentation as requested

Jeff Beach, CPPM

Manager of Retired CG Boats & Decommissioned Cutters USCG Headquarters @ ST "E" Campus
(202) 372-3646